UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

MAY 22 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer to: 3HW16

Mr. James R. Cossaboon,
Site Services Manager
Certainteed Corporation
750 East Swedesford Road
Valley Forge, PA 19482

Re: Certainteed Pile, Ambler Asbestos Site,
Ambler, Pennsylvania (see enclosed map)

Dear Mr. Cossaboon:

The United States Environmental Protection Agency (EPA or the Agency) has expended public funds to investigate threatened releases of hazardous substances at the above referenced site. This letter notifies you that EPA may spend additional public funds on action to further investigate and control these threatened releases. Unless EPA determines that a responsible party will properly perform such actions, EPA intends to do so pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq. as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-449, 100 Stat. 1613 (October 17, 1986), (CERCLA) and the National Contingency Plan, 40 C.F.R. § 300.68. Specifically, the Agency intends to conduct or oversee a Focused Remedial Investigation/Feasibility Study (RI/FS) at the Certainteed Pile, Ambler Asbestos Site, Ambler, Pennsylvania. The Ambler Asbestos Site consists of two waste piles on Nicolet, Inc's. property and the Certainteed Pile. The Ambler Asbestos Site is on EPA's National Priority List. A Remedial Investigation/Feasibility Study is being conducted by EPA on Nicolet Inc's. piles. By means of this letter, Certainteed has the opportunity to either conduct the Focused RI/FS on their pile or to collect the necessary data for such a Focused RI/FS. EPA would then take that data and incorporate it into the ongoing RI/FS that it is conducting on Nicolet Inc's. piles. The necessary data collection includes, but is not limited to the following: 5 borings, 2 piezometers, 2 test pits, 5 stream samples, 5 air samples, 5 sediment samples, 10-20 cover soil/bulk samples. Enclosed is EPA RI/FS guidance.

The Agency will, upon request, discuss this information with your company and will provide additional information on the nature and extent of the threatened releases.

In addition to the above studies, your company may be asked at a later date to undertake, or may be liable for, any additional corrective measures necessary to protect public health, welfare, or the environment. Such measures may include but are not limited to designing and implementing the EPA approved remedial option; and providing any monitoring and maintenance necessary after remedial measures are completed.

Under Section 122(e) of CERCLA, as amended, 42 U.S.C. § 9622(e), responsible parties may be extended the opportunity to present a good faith proposal to conduct the RI/FS to the Agency within sixty (60) days of receipt of a "special notice" letter. This special notice letter will be forwarded to you at such time that your company has expressed some interest in performing or participating in the Focused RI/FS and the Agency determines that such notice would facilitate an agreement and expedite remedial action. Should this proposal be received by the Agency within this time frame, the Agency will allow additional time totaling ninety (90) days from receipt of the special notice letter for negotiations between your company and the Agency. This good faith proposal should be in writing and indicate your company's qualifications and willingness to conduct or participate in the Focused RI/FS.

EPA will consider an immediate offer from you to conduct (under EPA supervision) the Focused RI/FS described in the attached scope of work. Under Section 104(a) of CERCLA, as amended, 42 U.S.C. § 9604(a), the President must determine that the responsible party qualified to conduct the RI/FS, will promptly and properly complete the same and agree to reimburse the government for any costs incurred by or in connection with the RI/FS in order to allow the responsible party to undertake such action. Your company may also fund an EPA directed Focused RI/FS. Any agreement to perform or fund all or part of the Focused RI/FS will be embodied in a consent order under Section 106 of CERCLA, as amended, 42 U.S.C § 9606. You should notify EPA in writing within fourteen (14) calendar days from the receipt of this letter, of whether your company is willing to conduct or participate in the Focused RI/FS. Your correspondence should be addressed to Hector Abreu (3HW16), 841 Chestnut Building, Philadelphia, Pennsylvania 19107. If you need further information, Mr. Abreu can be reached at (215) 597-9562. Your letter should indicate the appropriate name, address and telephone number for further contact with a representative of Certainteed. Otherwise, EPA will assume that your company declines any involvement in the Focused RI/FS and will proceed with the appropriate studies and any expedited response actions needed to secure the site. EPA may later

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invite your company to undertake the design and implementation of the selected remedy upon the Agency's completion of the Focused RI/FS.

Should your company provide the expression of willingness to conduct or participate in the Focused RI/FS as described above, EPA will refrain from expending funds for the site for a period of time so that meaningful discussions concerning a Consent Order can take place. In order that remedial actions proceed expeditiously, the maximum period of time that EPA will allow for discussions is ninety (90) calendar days from receipt of a special notice letter.

If your company is already involved in discussions with State or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this site, you should not interpret this letter to advise or direct your company to restrict or discontinue any such activities. On the other hand, this letter should not be interpreted as endorsing any such efforts by State or local authorities. You should report, however, the status of those discussions or that action in your letter to us. Please provide a copy of your letter to any other party involved in those discussions. You should also be aware that this site can not be delisted from the CERCLA National Priority List until after an RI/FS has been completed and the necessary remedial work concluded in accordance with the enclosed RI/FS guidance and EPA's National Contingency Plan.

Under Section 107 of CERCLA, as amended, 42 U.S.C. § 9607. responsible parties are liable for the costs of response actions. Under this Section, responsible parties included:

1. present owners or operators of the site; 2) owners or operators at the time of disposal; 3) any persons who arranged for disposal or treatment of hazardous substances at the site; and, 4) transporters of hazardous substances to the site. EPA has information indicating that you are the present owner of the site and that you were the owner at the time of disposal.

Under Section 106(a) and 107(a) of CERCLA, as amended, 42 U.S.C. § 9606(a) and 9607(a), responsible parties may be obligated to implement any needed relief actions as determined by EPA and may also be liable for all costs incurred by the government in responding to any release or threatened release of hazardous substances at the site. Such costs can include, but are not limited to, expenditures for investigation, planning, cleanup of the site, and enforcement. By this letter EPA notifies you of your company's potential liability with regard to this matter and encourages your company to voluntarily undertake the Focused RI/FS which will be overseen by EPA.

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The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be and cannot be relied upon as a final agency position on any matter set forth herein.

This information request is not subject to the Office of Management and Budget Review under the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Sincerely,

Stephen R. Wassersug, Director
Hazardous Waste Management Division

Enclosures: location map,
EPA RI/FS guidance

cc: Timothy Alexander
Gene Lucero
Lydia Isales, Esquire
Suzanne Canning
Donald Lazarchik

3.5 REMEDIAL INVESTIGATION/FEASIBILITY STUDY OBJECTIVES

The ultimate objectives of this study are:

- To quantify the type and extent of contamination (surface water, groundwater, sediment, soil) on-site and off-site.
  - Develop a causal relationship between current contamination and origin/source.
  - Establish the potential for future off-site contaminant migration.
  - Identify/develop standards and criteria for contaminant clean-up.
  - Determine the magnitude and probability of actual or potential harm to public health, welfare, or the environment.

o Remedial Action Assessments

- Identify technological options for preventing migration of contaminants beyond installation boundaries.

- Evaluate remediation alternatives consistent with the National Contingency Plan and other regulatory goals and guidelines.

- Recommend the remedial action that is technically and environmentally sound, and the most cost effective.

The following 'Scope of Work' has been developed to reach these objectives.

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4.0 WORK PLAN - SCOPE OF WORK

The scope of work to be performed during the preparation of the Work Plan are presented in Tasks 1-8.

4.1 TASK 1. PREPARE WORK PLAN MEMORANDUM

Objective: Prepare a Work Plan Memorandum describing the initial tasks to be performed to prepare the work plan and to identify the level of effort, associated costs and schedule.

Data Sources: As listed in Task 2 as well as information resulting from a preliminary site reconnaissance.

Deliverables: Work Plan Memorandum.

4.2 Task 2. INITIAL SITE EVALUATION

Subtask 2.1 - Evaluate Existing Information

Objective: Develop a file of existing information for use in preparing the work plan defining the Remedial Investigation (RI), and preparing the Feasibility Study (FS).

Data Sources:

1. USEPA Region III file data
2. EPA FIT Reports and data
3. EPA TAT - Inspection Reports
4. Pennsylvania DER files, if appropriate

Assumptions:

1. USEPA will provide access to and furnish required data
2. Site data are valid with respect to QA/QC protocols

Deliverables: Interim Report (draft) including:

1. List of information obtained to include a chronological history of operations and response actions conducted at the site and a listing of all materials known to have been deposited or stored at the site.

2. Description of known or potential problems associated with the existing data.

3. Identification of data gaps.

4. Initiation of site data management system.

5. A history of public concerns and information or outreach activities at this site.

Subtask 2.2 - Prepare Site Plans

Objective: Prepare a site plan(s) showing existing site information to be used to field-confirm existing information and conditions, to establish the site boundary conditions for input into the limits of survey to be developed in the work plan.

Data Sources:
1. Reconnaissance of site
2. USGS information
3. Interim Report information developed in Subtask 2.1
4. Available historic aerial photographs.

Assumptions:
1. Site plan(s) is only for use in conceptualizing the work plan requirements. Accurate, more detailed plans will be prepared during the Remedial Investigation.

Deliverables: Site plan(s)

Subtask 2.3 - Perform Initial Site Characterization

Objective: Field confirm-data obtained in Subtask 2.1, and confirm the site-specific health and safety requirements.

Data Sources:
1. Interim report information from Subtask 2.1
2. Site Plan from Subtask 2.2

Assumptions: Site access furnished by USEPA

Deliverables: 1. Interim Report (final)

2. Revised site plan(s) (prepared in Subtask 2.2 - revisions will be based on field observations)

4.3 Task 3. DESIGNATED SUPPORT ACTIVITIES

During the preparation of the work plan, two support activities will be performed.

1. Evaluation of vegetative growth potential on the side slopes of the existing piles, and preliminary evaluation of the slope stability of the piles. This will include soil sampling, as well as an evaluation of the existing vegetation.

2. Maintenance of the vegetative cover for an interim period (approximately 18 months).

4.4 Task 4. PREPARE WORK PLAN

Subtask 4.1 - Prepare Draft Work Plan

Objectives: Prepare a Draft Work Plan describing the Remedial Investigation/Feasibility Study (RI/FS), using the products of Tasks 2 and 3.

Data Sources: Products of Tasks 2 and 3.

Assumptions: Work Plan will be a two volume document covering the RI/FS activities and cost estimate.

Deliverables: Draft Work Plan including estimated budgets and schedules for the remedial investigation and feasibility study for the long-term remedial action addressing contamination on-site and off-site for soils, groundwater, surface water, sediments, local potable wells, and water supply reservoir.

The Work Plan will include specific, discrete tasks to be performed. The plan will include the items listed below:

1. Review and evaluate existing reports and technical data.

2. Obtain and analyze samples from monitoring wells, residential wells, and surface water.

3. Perform necessary geophysical surveys to identify geological formations.

4. Evaluate surface water flow and groundwater conditions.

5. Drill soil borings to determine the depth of soil contamination for possible removal or treatment.

6. Identify and screen potential remedial alternatives.

7. Compare and evaluate final alternatives.

8. Develop preliminary design and cost estimates for the final remedial alternatives.

9. Prepare Remedial Investigation and Feasibility Study Reports.

10. Schedule of Activities.

11. Budget.

12. Define deliverables.

Subtask 4.2 - Prepare Final Work Plan

Objectives:

1. Produce documents to direct the Ambler Asbestos Pile Site remedial investigation/feasibility study incorporating appropriate agency, industry, and public comments as directed in writing to EPA.

Assumptions:

1. EPA will summarize the agency comments required for incorporation into the Final Work Plan.

2. EPA will direct which review comments are to be incorporated into the final document.

4.5 Task 5. PREPARE PROJECT OPERATIONS PLANS

Objectives: To prepare project plans necessary for the execution of the work and to insure that the work is conducted in a consistent manner that satisfies the reviewing and using agencies' requirements prior to execution.

Data Sources:

1. Information collected from existing site files and initial site characterization visit.
2. REM II Guidance Documents.
3. Region III directives and procedures.
4. State and local reports and procedures ordinances.
5. EPA approved REM II Health and Safety Assurance Manual.
6. Quality Assurance Program Plan for Performance of Remedial Response Activities at Uncontrolled Hazardous Waste Sites.
7. Community Relations Policy (Superfund Guidance Documents).

Assumptions: The REM II approved program plans will form the basis for the respective site-specific plans.

Deliverables: Health and Safety Plan Element

A site-specific health and safety plan element will be prepared for approval, using input from Task 2. The plan will include:

- Personnel protective equipment requirements, keyed to generalized site location and activity.
- Safety equipment inventory.
- Training requirements.
- Medical surveillance program.
- Appropriate medical procedures.
- Personnel hygiene requirements.
- Contingency plan and emergency procedures.
- Site personnel/activity safety monitoring program.
- Decontamination procedures.

The plan will be organized to apply to the RI field work. This plan will be consistent with CERCLA (Section 111(c)(6)) and EPA requirements.i

Field Sampling (rec) and Analysis Plan Element

A site-specific sampling and analysis plan element based on the findings of the initial investigations phase, will be developed. The plan will include sampling, analytical, and documentation requirements for the RI/FS. This plan will be developed in accordance with EPA-approved Site Investigations Procedure Manual.

Site Management Plan Element

A plan element will be developed, detailing project operations at the site, including site access and security, contingency plans for other than site personnel, and the general coordination and operational planning of activities to be performed at the site.

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Data Management Plan Element

A Data Management Plan element will be prepared to guide the efficient management of the data which will result from this assignment. This plan will include:

- Data recording/gathering format
- Data file type and location
- Data file control assignment (by individual) and sign-out procedure
- Procedures/timing for return of information to file (e.g., no data left at work station overnight)
- Back-up file procedures, requirements, locations, and updating periods

Standardized REM II Team procedures will form the basis for Data Management Plan development usage.

Quality Assurance Project Plan

A site-specific Quality Assurance Project Plan will be prepared, identifying the procedures and protocols to be used to insure that the environmental monitoring data and deliverable reports are of acceptable quality for the project.

EPA's Interim Guidelines and Specifications for Preparing Quality Assurance Project Plan, EPA-600/4-83-004, will be used as the basis for the deliverable.

4.6 Task 6. COMMUNITY RELATIONS SUPPORT

Objectives: Community relations support activities will be conducted to meet identified community needs and the schedule requirements. These community relations "implementation" activities will focus on three main tasks:

- o Preparation of fact sheets and news releases
- o Attending scheduled meetings, and
- o Assisting in Community outreach, if requested

At least one meeting will be held with EPA Region III to discuss details of the community relations support activities prior to completing the final work plan.

Data Sources: Information developed during the RI/FS

Assumptions: A Community Relations Plan was prepared for the initial removal actions. (This Plan will be updated and revised per discussions with EPA Region III under separate work assignment.)

Deliverables: Information as requested for dissemination.

4.7 Task 7. TECHNICAL AND FINANCIAL MANAGEMENT

Objective:

1. Prepare and submit monthly technical and financial progress reports and weekly highlights.
2. Attend progress meetings.
3. Conduct work effort, quality control, and QA audits.
4. Implement document control procedures and project schedule controls.

Deliverables: Monthly technical and financial reports, weekly highlights.

5.0 SCHEDULE

The Schedule of Activities by Task and Subtask is presented in Attachment B. As shown, it is estimated that the Final Work Plan will be completed the week of 30 August 1985.

The Schedule of Deliverables is presented in Attachment C and shows distribution and approval dates.

6.0 PROJECT STAFFING

1. Glenn M. Johnson, P.E. of WESTON is the REM II Region III Manager. A resume is included as Attachment D.

2. R. Lee Steiner, P.E., Ph.D., of WESTON will be the Site Manager for the Ambler Site. A resume is included as Attachment D.

4. David Doyle, P.E. of Camp Dresser & McKee is the REM II Technical Operations Manager.

5. Camp Dresser & McKee will provide input on health and safety, quality assurance, and on specific tasks, as required.

6. ICF will provide the Community Relations Plan preparation and support services.

7. Clement Associates will provide the exposure, risk, and endangerment assessment support services.

8. C.C. Johnson and Associates may provide technical assistance on a task-specific basis.

ATTACHMENT A

WORK ASSIGNMENT

WESTON DESIGNERS CONSULTANTS

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REM II MEMORANDUM

TO: D. F. Doyle, Manager of Technical Operations
CDM Inc., One Center Plaza,Boston, MA 02108

FROM: R. Lee Steiner

DATE: May 31, 1985

PROJECT: EPA Contract No.: 68-01-6939

DOCUMENT NO.: 223-WP1-CM-APHG-1

SUBJECT: Staff Conflict of Interest Declaration
Site: Ambler Asbestos
Work Assignment No.: 123-3LA6.0

ACTION: Immediate Response

I have reviewed the above work assignment for the US EPA Contract 68-01-6939, Remedial Response Activities at Uncontrolled Hazardous Waste Sites. Based upon this review and my understanding of the legal requirements of this work, I certify that I have no known conflict of interest associated with this assignment based upon the known potential responsible parties or my past work experience with this site, if any. Also, I understand my professional obligation to inform any staff working at my direction on this assignment of the conflict of interest requirements and ensure that such staff have no such conflicts of interest.

_____
Signature

_____
Date

cc: J. G. Curtis
Camp Dresser & McKee Inc.
7630 Little River Turnpike
Suite 500
Annandale, VA 22003

SAMPLE WORK ASSIGNMENT COVER SHEET

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A. Contractor: Camp, Dresser & McKee
7630 Little River Turnpike
Suite 500
Annandale, VA 22003

B. Contract Number: 68-01-6939

C. SITE/Title: Ambler Asbestos Pile, PA

D. Assignment Number: 123-3LA6

E. Statement of Work: (See Attached)

F. Level of Effort (Work Hours): 1000

G. Period of Performance: April 1985 - October 1986

Contracting Officer

IKA Joiner PHONE 382-317
Environmental Protection Agency (PM-214-
401 M Street, S.W.
Washington, D.C. 20460

Contracting Officer Approval Ika D Joiner Date MAY

Regional Project Officer

Signature [signature] Date 4

Regional Project Officer

Signature [signature] Date _

Region Site Project Officer

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ATTACHMENT B

SCHEDULE OF ACTIVITIES

AMBLER ASBESTOS PILE - SCHEDULE OF ACTIVITIES

SCHEDULE OF ACTIVITIES

TASKS	07-Jun	14-Jun	21-Jun	28-Jun	05-Jul	12-Jul	19-Jul	26-Jul	02-Aug	09-Aug	16-Aug	23-Aug	30-Aug	06-Sep	13-Sep	20-Sep
	WEEK ENDING															
1.0 WORK PLAN MEMO	========	========	========													
2.0 INIT SITE EVAL	========	========	========	========	========	---DADADADADADA---		========								
3.0 RES ACTIVITIES					========	========	========	========	========	========	========	========	========	========		
4.0 WORK PLAN PREP																
4.1 Draft Work Plan	========	========	========	========	========	========	---DADADADADADA---		========	-----EPA REVIEW-----		-----EPA REVIEW-----				
4.3 Final Work Plan														========	========	========
5.0 DRAFT POP	========	========	========	========	========	========	---DADADADADADA---		========	-----EPA REVIEW-----		-----EPA REVIEW-----		========	========	========
6.0 COMM RELAT SPT	========	========	=====ONGOING	========	========	========	========	========	========	========	========	========	========	========	========	========
7.0 TECH/FINAN MAN	========	========	=====ONGOING	========	========	========	========	========	========	========	========	========	========	========	========	========
8.0 QA REVIEW						========	========	========							========	========

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ATTACHMENT C

SCHEDULE OF DELIVERABLES

SCHEDULE OF DELIVERABLES

AMBLER ASBESTOS PILE

ATTACHMENT D

DELIVERABLE	WORK ASSIGNMENT		QUALITY CONTROL PLAN (QCP)		QUALITY SURVEILLANCE		REM II APPROVAL				USEPA REVIEW				STATE REVIEW	OTHER REVIEW
	AUTH.	DUE	ACTIVITY	DATE	ACTIVITY	DATE	RM	TOM	HSM	FAM	PO	CO	RPC	RSPO		
WORK PLAN MEMO	5/9/85	6/21/85														
INITIAL SITE EVALUATION		7/26/85	Peer Rev. RM Rev.	7/5/85 7/8/85			7/5	7/19	7/15	7/15	8/23	8/23	8/16	8/16	9/6	
WORK PLAN																
DRAFT		8/02/85	Peer Rev. RM Rev.	7/12/85 7/16/85			7/15	7/29	7/26	7/26	8/30	8/30	8/23	8/23	9/20	
FINAL		9/20/85					9/18									
PROJECT OPER PLAN	5/9/85															
1st DRAFT		8/16/85	Peer Rev. RM Rev.	7/26/85 7/29/85			7/29 10/2	8/12	8/9	8/9	9/13	9/13	8/21	8/21	10/4	
REVISED DRAFT		10/4/85														

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ATTACHMENT D

KEY STAFF RESUMES

R. Lee Steiner, Ph.D., P.E.

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Registration

Registered Professional Engineer in the states of Pennsylvania, Delaware, Rhode Island, New Hampshire, New Jersey, Ohio, Tennessee and Texas

Fields of Competence

Development of solid and hazardous waste management disposal programs; evaluation of waste treatment/disposal options; regulatory compliance evaluations, design, operation and evaluation of land disposal sites, design and evaluation of industrial wastewater treatment processes; development of industrial wastewater treatability studies, performance of solid waste market surveys; design of landfill leachate collection and treatment systems, design of landfill gas control and recovery systems.

Experience Summary

Eighteen years experience in civil and environmental engineering pertaining to solid and hazardous waste management, including five years research for the U.S. Environmental Protection Agency (EPA) in the behavior of sanitary landfills and three years experience in the operation of solid and hazardous waste disposal sites. Was responsible for the administration of all environmental programs at six waste disposal sites for a major waste disposal firm, including the RCRA hazardous waste permit program. Technical experience and environmental engineering consulting with strong emphasis in solid and hazardous waste disposal technology.

Credentials

B.S., Civil Engineering (sanitary engineering and geotechnical specialty)—Drexel Institute of Technology (1966)

M.S., Environmental Engineering (EPA Solid Waste Traineeship)—Drexel University (1967)

Ph.D., Environmental Engineering—Drexel University (1973)

Chi Epsilon

American Society of Civil Engineers

Water Pollution Control Federation

Water Pollution Control Federation of Pennsylvania

American Public Works Association

GRCDA

NSWMA

Employment History

1984-Present	WESTON
1981-1984	EMCON Associates
1978-1981	Waste Resources Corp.
1973-1978	AGES Corp.
1966-1973	Drexel University

Key Projects

Project manager for the preparation of Part B applications for clients in southeastern Pennsylvania. Review of the existing data, existing operations and preparation of the detailed submission, including Waste Analysis Plans and PPC Plans.

Project manager for the certification of the closure of a hazardous waste disposal site.

Project manager for the preparation of operation and maintenance procedures and manuals for a sanitary landfill leachate treatment plant.

Design of leachate treatability tests and pilot or operation tests for leachate in municipal sewage treatment plants.

Design of conceptual landfill leachate collection systems for proposed sanitary landfills in Delaware and New Jersey, including estimated leachate production and composition, stormwater runoff, and moisture holding capacity of soil and refuse. Evaluation of possible liner materials and the effects of landfill leachate on each liner material. Design of liner configuration and liner efficiency for each material.

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Professional Profile

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ystem computer modeling control methods analysis, nd preliminary designs

Project Engineer for joint municipal industrial (pulp and paper mill) treatment plant development study in Westbrook, ME

Concept and process design engineer for pulp and paper wood product industry wastewater treatment facilities design projects including 50-60 mgd facilities design in North Carolina and Texas primary treatment and lagoon system design in Mississippi, and numerous smaller plant designs in Pennsylvania Assignments included plant surveys, in-plant waste reduction and reuse studies, treatibility analyses, preliminary designs, plans and specifications, and operating guidance.

Field sampling coordination of comprehensive waste stream characterization for large, integrated steel mill.

Project Engineer for investigation of oily waste disposal in the New York Harbor for the U.S Maritime Administration

Surface Water Resources

Senior Project Manager and Senior Engineer for a five-year comprehensive Water Quality Management Plan development project in the Upper Delaware River Basin for Pennsylvania Department of Environmental Resources

Senior Engineer for municipal engineering services (township Engineer) involving drainage systems, construction inspections, surface and groundwater studies, land conservation, and small community wastewater systems.

Computer modeling of the Genessee River Basin waterways in the Finger Lakes Region for the New York State Department of Environmental Conservation.

Project Manager for the Puerto Rico Islandwide Urban Stormwater Management Study which included computer modeling and engineering assessments for five urban areas

Project Manager and Analyst for river-based recreation assessment method development and demonstration (on the Allegheny River) for the U.S Corps of Engineers Institute for Water Resources

Senior Engineer in preparation of a Delaware Coastal Water Quality Management Plan for the state of Delaware

Conducted stream and river surveys for characterization and assimilative capacity analysis in Alabama Mississippi, Maine, North Carolina Ohio, and Pennsylvania

Residuals and Hazardous Waste Management

Project Manager and Senior Engineer for preparing three county-level solid waste management plans in New Jersey including waste generation and transportation assessments, incineration/co-disposal/resource recovery evaluations, energy marketing analysis, institutional considerations, and local/state participation.

Project Director for two major municipal wastewater sludge handling processing and incineration problem assessments involving specific technologies and facilities for the U S EPA

Senior Field Engineer for PCB oil storage/spill site investigation in Pennsylvania Site Manager for field investigation and remedial engineering analysis of a electroplating plant chromium waste discharge ground water contaminated site in Virginia

Project Director of major PCB-contaminated soil site cleanup project resulting in preparation of detailed plans/specifications for the U.S Army Corps of Engineers Project Manager for technical services at a drum storage site in Ohio and hazardous sludge lagoon site in Pennsylvania for the U.S. EPA.

Process Engineer for wastewater treatment sludge disposal studies at an integrated kraft and pulp and paper mill

Environmental and Natural Resource Programs

Project Director and Analyst for wastewater treatment plant operations and Discharge Permits Improvement Study for the state of Pennsylvania

Senior staff member and Project Manager for the Institutional (Management) Plan element preparation within the Upper Mississippi River Basin Master Plan for the Upper Mississippi River Basin Commission.

Project Manager and Senior Engineer in developing the Delaware Rural Wastewater Management Plan and the Delaware Critical Areas Plan for the state of Delaware

Senior Engineer and Project Manager/Consultant in fifteen areawide water quality and wastewater management ("208") planning projects in NY, OH, DE, PR, NC, TX and FL

Senior Investigator on the preparation of West Virginia's first year State Water Quality Management Program Plan

Consultant to the development of U.S EPA's Small and Alternative Wastewater Systems Strategy

Selected Publications

"Dewatered Sludge Applications to Sand Beds", (M S Thesis) G Johnson

"Conform Control in Pulp and Paper Wastewater" G Johnson and H Eddy

"Desk Top Modeling of Storm Water Pollution, A State-of-the-Art Assessment", D Lakatos G Johnson.

"Water Quality Analysis" (208 Planning Monograph) G Johnson, K. Wiswall.

"Case Studies in Regional Water Quality Management", G. Johnson.

"Management Districts—A Key to Implementing an On-Log Disposal Alternative", A. MacGregor and G. Johnson.

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Glenn M. Johnson, P.E. (red)

Registration

Registered Professional Engineer in Pennsylvania

Fields of Competence

Engineering and consulting services administration diversified projects direction and management, environmental and water resources engineering municipal and industrial water/wastewater/residuals systems planning and design; hazardous waste management, physical impacts and economic analysis.

Experience Summary

Over fifteen years experience in many aspects of environmental engineering and resource management. Extensive experience in:

Facilities planning and conceptual engineering design for wastewater treatment systems including field surveys, laboratory and pilot studies, process designs, civil and hydraulic engineering alternative evaluation, and cost analysis Surface water resources analysis including hydrologic and quality assessments, computer modeling, structural and nonstructural controls development, areawide and regional/basin plans preparation, and financial and implementation programs development Sludge, solid waste, and hazardous waste management including residuals generation and in-plant controls recovery and/or disposal plan development co disposal analysis waste disposal sites investigation remedial measures engineering and site regulations plans development

Experienced in State and Federal environmental and natural resources management programs including plan development policy analysis and regulations and procedures assessments. Consulting engineering projects administration/management including project leadership, client and public liaison, technical quality controls, budgetary and scheduling controls, technical group supervision and documents preparation.

Credentials

B.S Civil Engineering and B.S Sanitary Engineering — Pennsylvania State University (1964)

M.S., Environmental Health Engineering—Northwestern University (1965)

Doctorate level course work Water Resources Systems Engineering and Resource Economics—Cornell University (1968-1971)

American Society of Civil Engineers, National Technical Committee Chairman

American Water Resources Association

Diplomate, American Academy of Environmental Engineers

Employment History

1972-Present	WESTON
1968-1972	Cornell University
1965-1968	WESTON
1962-1963	National Forge Company
1961-1962	Chicago Bridge and Iron Company
1960	U.S. Forest Service

Key Projects

Wastewater Treatment Systems

Project Director and Senior Engineer in numerous municipal wastewater and sludge technology assessments and R&D assignments for the U S EPA Evaluated equipment concepts applications operations and performance for innovative alternative and advanced systems including emerging U S and European conveyance and treatment methods Developed technical feasibility manuals cost-effectiveness procedures and utility management guidance and conducted national technology transfer seminars on small community conventional and tertiary treatment technologies

Prepared the Domestic Wastewater Teatment Design Manual for military installations for U.S. Army and U.S. Air Force.

Senior Project Manager for a two-year combined sewer overflow project in the Camden, NJ urban area involving extensive and extended sewer system monitoring

AR000790

Professional Profile

ORIGINAL
(red)

ATTACHMENT E

CONFLICT OF INTEREST DECLARATIONS

AMBLER ASBESTOS PILE - EXPENSE ESTIMATE

TASK	EQUIPMENT 50 DAYS	EQUIPMENT $/DAY $	PER DIEM 90 DAYS	PER DIEM $/DAY $	TRANSPORTATION $	SUB-POOL $	G&A $	TOTAL $
TASK 1		0		0	50			50
TASK 2	2	100		0	200			300
TASK 3		0		0	200	1.000		1.200
TASK 4		0		0	100			100
TASK 5		0		0	50			50
TASK 6		0	2	180	600			780
TASK 7		0		0				0
TASK 8		0		0				0
	2	100	2	180	1.200	1.000	0	2.480

ATTACHMENT D

ODC WORKSHEETS

WESTON DESIGNERS CONSULTANTS

REM II MEMORANDUM

TO: D. F. Doyle, Manager of Technical Operations
CDM Inc., One Center Plaza,Boston, MA 02108

FROM: Glenn M. Johnson

DATE: May 31, 1985

PROJECT: EPA Contract No.: 68-01-6939

DOCUMENT NO.: 223-WP1-CM-ASWR-1

SUBJECT: Staff Conflict of Interest Declaration
Site: Ambler Asbestos
Work Assignment No.: 123-3LA6.0

ACTION: Immediate Response

I have reviewed the above work assignment for the US EPA Contract 68-01-6939, Remedial Response Activities at Uncontrolled Hazardous Waste Sites. Based upon this review and my understanding of the legal requirements of this work, I certify that I have no known conflict of interest associated with this assignment based upon the known potential responsible parties or my past work experience with this site, if any. Also, I understand my professional obligation to inform any staff working at my direction on this assignment of the conflict of interest requirements and ensure that such staff have no such conflicts of interest.

_____
Signature

_____
Date

cc: J. G. Curtis
Camp Dresser & McKee Inc.
7630 Little River Turnpike
Suite 500
Annandale, VA 22003

WESTON DESIGNERS CONSULTANTS

ORIGINAL
(red)

REM II MEMORANDUM

TO: D. F. Doyle, Manager of Technical Operations
CDM Inc., One Center Plaza,Boston, MA 02108

FROM: Edward F. Gilardi

DATE: May 31, 1985

PROJECT: EPA Contract No.: 68-01-6939

DOCUMENT NO.: 223-WP1-CM-BDDR-1

SUBJECT. Staff Conflict of Interest Declaration
Site: Ambler Asbestos
Work Assignment No.: 123-3LA6.0

ACTION. Immediate Response

I have reviewed the above work assignment for the US EPA Contract 68-01-6939, Remedial Response Activities at Uncontrolled Hazardous Waste Sites. Based upon this review and my understanding of the legal requirements of this work, I certify that I have no known conflict of interest associated with this assignment based upon the known potential responsible parties or my past work experience with this site, if any. Also, I understand my professional obligation to inform any staff working at my direction on this assignment of the conflict of interest requirements and ensure that such staff have no such conflicts of interest.

_____
Signature

_____
Date

cc: J. G. Curtis
Camp Dresser & McKee Inc.
7630 Little River Turnpike
Suite 500
Annandale, VA 22003

ORIGINAL
(red)

WORK PLAN MEMORANDUM
FOR
AMBLER ASBESTOS PILE
AMBLER, PENNSYLVANIA

REMEDIAL INVESTIGATION/
FEASIBILITY STUDY

MAY 31, 1985

** COMPANY CONFIDENTIAL **

This Work Plan Memorandum, prepared by the REM II Team in accordance with the items of the U.S. EPA Contract No.: 68-01-6939, is Company Confidential.

Work Assignment No.: 123-3LA6
Document No.: 223-WPI-WM-BDEQ-1

TABLE OF CONTENTS

ORIGINAL
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1.0 INTRODUCTION

The costs presented in this volume were developed based on the information available to prepare the Work Plan Memorandum. Many of the assumptions outlined by task in the Technical portion of the Work Plan Memorandum can be expected to affect costs for the completion of the Work Plan. These assumptions have been considered where appropriate.

2.0 BUDGET

The costs associated with the initial tasks are presented in Attachments A through D. Attachment A contains the estimated costs associated with each task, including labor, expenses and other direct costs (OCD'S). Attachment B contains the estimated labor hours and costs by task. Attachment C contains the estimated expenses associated with each task, and Attachment D contains the estimated ODC's.

Form 60's will be prepared and presented in the work plan, and will include a summary of all costs for the entire Work Assignment.

During the RI/FS phase, time and expenses will be budgeted for community relations implementation activities.

AMBLER ASBESTOS FILE - PROJECT SUMMARY

TASK	PROFESSIONAL HOURS	PROFESSIONAL $	SUPPPORT HOURS	SUPPPORT $	EQUIPMENT $	TRAVEL $	ODC's $	SUB-POOL $	INDIRECT $	TOTAL $
1.0 WORK PLAN MEMO	52	2,510	24	355	0	50	75	0		2,990
2.0 INIT SITE EVAL	140	5,751	32	473	100	200	100	0		6,624
3.0 DES ACTIVITIES	32	1,720	0	0	0	200	0	1,000		2,920
4.0 WORK PLAN PREP	268	11,853	122	1,805	0	100	1,000	0		14,758
5.0 DRAFT POP	344	14,496	140	2,071	0	50	600	0		17,217
6.0 COMM RELAT SUP	44	2,427	82	1,322	0	780	560	0		5,089
7.0 TECH/FINAN MAN	72	4,316	80	1,354	0	0	400	0		6,070
8.0 QA REVIEW	32	2,442	24	457	0	0	75	0		2,974
TOTAL	984	45,515	504	7,837	100	1,380	2,810	1,000	0	58,642

ATTACHMENT B

LABOR WORKSHEETS

AMBLER ASBESTOS PILE - LOE ESTIMATE

TASK ELEMENT	PROFESSIONAL 4 76.32 $/MH		PROFESSIONAL 3 53.74 $/MH		PROFESSIONAL 2 41.89 $/MH		PROFESSIONAL 1 30.02 $/MH		TECHNICAL 2 19.39 $/MH		TECHNICAL 1 10.94 $/MH		TOTAL TECH. LOE		CLERICAL 2 19.85 $/MH		CLERICAL 1 14.79 $/MH		TOTAL	
	HOURS	$	HOURS	$	HOURS	$	HOURS	$	HOURS	$	HOURS	$	HOURS	$	HOURS	$	HOURS	$	HOURS	$
1.0 WORK PLAN PREPARATION		0	40	2,150	0	0	12	360		0	0		52	2,510		0	24	355	76	2,865
2.0 INITIAL SITE EVALUATION		0	36	1,935	80	3,351		0	24	465	0		140	5,751		0	32	473	172	6,224
3.0 DESIGNATED ACTIVITIES		0	32	1,720	0	0		0		0	0		32	1,720		0		0	32	1,720
4.0 WORK PLAN PREPARATION																				
4.1 Draft Work Plan	8	611	56	3,009	84	3,519	20	600	12	233	0		180	7,972		0	82	1,213	262	9,185
4.3 Final Work Plan	4	305	28	1,505	40	1,676	8	240	8	155	0		88	3,881		0	40	592	128	4,472
5.0 DRAFT PRP	8	611	100	5,374	156	6,535	40	1,201	40	776	0		344	14,496		0	140	2,071	484	16,566
6.0 COMMUNITY RELAT.SUPPORT	8	611	26	1,397	10	419	0	0		0	0		44	2,427	24	495	56	828	124	3,750
7.0 TECH/FIRM MANAGEMENT	24	1,832	40	2,150	8	335	0	0		0	0		72	4,316	48	762	40	592	152	5,670
8.0 QA REVIEW	32	2,442	0	0	0	0	0	0		0	0		32	2,442	24	457		0	56	2,899
TOTAL	84	6,411	358	19,239	378	15,834	80	2,402	84	1,629	0	0	984	45,515	96	1,715	414	6,123	1,488	53,352

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ATTACHMENT C

EXPENSE WORKSHEETS

AMBLER ASBESTOS PILE - ODC ESTIMATE

TASK	XEROX $	BLUE-PRINTS $	MAIL/ COURIER $	SUPPLIES $	TELE-PHONE $	COMPUTER $	$	G&A $	TOTAL $
TASK 1	25		25		25				75
TASK 2	50		25		25				100
TASK 3									0
TASK 4	420	125	175	105	175				1.000
TASK 5	225	125	100	50	100				600
TASK 6	270		125	40	125				560
TASK 7	100		50		150	100			400
TASK 8	25		25		25				75
TOTAL	1.115	250	525	195	625	100	0	0	2.810

AMBLER ASBESTOS PILE - EXPENSE ESTIMATE

TASK	EQUIPMENT 50 DAYS	EQUIPMENT $/DAY $	PER DIEM 90 DAYS	PER DIEM $/DAY $	TRANSPORTATION $	SUB-POOL $	G&A $	TOTAL $
TASK 1		0		0	50			50
TASK 2	2	100		0	200			300
TASK 3		0		0	200	1.000		1.200
TASK 4		0		0	100			100
TASK 5		0		0	50			50
TASK 6		0	2	180	600			780
TASK 7		0		0				0
TASK 8		0		0				0
	2	100	2	180	1.200	1.000	0	2.480